

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**THIRD MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	02/01/2023 ¹	02/28/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$134,042.00 ² (80% of \$167,594.40)	
Total Reimbursable Expenses Requested in this Statement:	\$41.90 ³	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$153,686.50	
Total Actual Attorneys Hours Covered by this Statement:	267.80	
Average Hourly Rate for Attorneys:	\$573.88	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$13,866.00	
Total Actual Paraprofessional Hours Covered by this Statement:	48.20	
Average Hourly Rate for Paraprofessionals:	\$287.67	

¹ A very small amount of time/fees from December and January that was inadvertently omitted from prior statements has been included herein as allowed under the Interim Compensation Order.

² Counsel is holding \$172,842.87 as a retainer in its IOLTA Account which is included in this fee/expense request.

³ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Third Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from February 1, 2023 through February 28, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$134,042.00 (80% of 167,594.40) as compensation for professional services rendered to the Debtor during the period from February 1, 2023 through February 28, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$41.90, for a total amount of \$134,083.39 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhlpl.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughttry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$167,594.40 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$41.90 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$134,083.39⁴ which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

⁴ Such payment to be made first from any existing retainer funds held by C&D for the Debtor.

Houston, TX

Dated: March 30, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 737.218.6187

Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on March 30, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Online Research	41.90

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	82.10	33.9
B120 Asset Analysis and Recovery	4.6	0.0
B130 Asset Disposition	.5	0.0
B140 Relief from Stay/Adequate Protection	9.9	0.2
B150 Meetings of & Communications with Creditors	10.5	0.0
B160 Fee/Employment Applications	20.7	5.7
B170 Fee/Employment Objections	0.00	.2
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	4.1	0.0
B190 Other Contested Matters	50.9	4.8
B195 Non-Working Travel	6.8	3.4
B210 Business Operations	69.6	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	2.7	0.00
B240 Tax Issues	4.7	0.00
B250 Real Estate	0.00	
B260 Board of Directors Matters	0.00	
B310 Claims Administration and Objections	0.00	0.00
B320 Plan and Disclosure Statement	.7	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	267.80	48.20

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

March 30, 2023
Invoice # 752298

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$167,552.50
Current Invoice Total Expenses	<u>\$41.90</u>
Current Invoice Total	<u>\$167,594.40</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 752298 and any other invoice numbers being paid on your remittance.

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Invoice # 752298

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

12/02/2022	V. Driver	B110/	Alert relevant parties of BK filing (1.1); review and revise motion for status conference (.4); emails with UST and Court on Joint administration motion and comments to same (.2); address revisions to joint administration to address UST initial concerns (.3) call with potential PR firm (.8); review rules and procedures on sealing pleadings due to general security issues (.4).	3.20
12/02/2022	V. Driver	B140/	Emails discussing application of stay in CT matter with counsel related to judgment entry, motion practice and appeals.	0.40
12/21/2022	V. Driver	B150/	Brief review of multiple lengthy emails from creditor.	0.40
01/18/2023	V. Driver	B185/	Emails with committee to discuss potential resolution to AJ employment contract.	0.10
01/23/2023	V. Driver	B150/	Review emails from potential creditors.	0.60
02/01/2023	C. Craig	B160/	Draft application to employ the Reynal firm as Debtor's appellate counsel.	0.40

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Responsible Attorney

Vickie L. Driver

Post - petition

02/01/2023	V. Driver	B110/	Review list of information needed and revise same (1.2); work with financial professionals on list of information needed and send to FSS (.7); follow up from meeting with FSS in lengthy email (.4); call with E. Taube seeking historical information for schedules and statements (.7).	3.00
02/01/2023	V. Driver	B160/	Review and revise J&O fee statement.	0.70
02/01/2023	C. Stephenson	B160/	Review professional billing and draft related correspondence.	0.80
02/01/2023	C. Stephenson	B190/	Review draft protective order.	0.50
02/02/2023	V. Driver	B190/	Emails with A. Reynal on text release issues (.4); calls with client on text release issues (.7); calls with financial professionals on same (.4); emails with state court lawyers and review information sent (2.3).	3.40
02/02/2023	A. Gerard	B160/	Work on employment applications for Reynal and Martin.	2.50
02/02/2023	C. Stephenson	B190/	Review and analyze correspondence regarding various contested matters (.8); prepare for and attend call with UCC regarding outstanding case matters (.8).	1.60
02/03/2023	V. Driver	B110/	Emails with FSS on information production.	0.90

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Post - petition

02/03/2023	V. Driver	B150/	Review emails from creditors.	0.70
02/03/2023	C. Stephenson	B160/	Conference regarding engagement proposed order (.6); review financial professionals budget (.4).	1.00
02/05/2023	V. Driver	B110/	Emails with FSS on information production.	0.40
02/05/2023	V. Driver	B140/	Review and revise lift stay objection.	0.40
02/06/2023	V. Driver	B110/	Emails with FSS on need for access to information (.2); call with R. Battaglia on issues with information access (.7); review and analyze budget items (.9); review and analyze schedules support and information needed and seeking sources to answer same (3.2).e (3.2).	5.00
02/06/2023	V. Driver	B150/	Email to UST and UCC regarding resetting 341 in relation to due date for schedules.	0.20
02/06/2023	C. Stephenson	B150/	Conference regarding 341 meeting timing.	0.80
02/06/2023	C. Stephenson	B160/	Review and respond to correspondence regarding interim compensation procedures (1.1); review supplemental Zensky declaration (.4); review Nardello application (.9).	2.40
02/07/2023	V. Driver	B110/	Call with financial professionals on AJ Live (.5); Call with R. Battaglia on AJ Live issues (6).	1.10

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02/07/2023	V. Driver	B110/	Call with L. Freeman on status of case and information gathering (.9); call with co-counsel on status of case (.8); call with client on information needed for schedules and statements (.6).	2.30
02/07/2023	V. Driver	B140/	Review and revise objection to lift stay motion and send to R. Battaglia for review and comment (1.1); call with Mediator on idea to resolve stay (.8).	1.90
02/07/2023	V. Driver	B160/	Emails on draw down and payment terms from engagement and order on employment.	0.30
02/07/2023	V. Driver	B190/	Interviewing attorney for related parties to assist committee discovery.	0.50
02/07/2023	A. Gerard	B140/	Revise and finalize objection to Pozner/De La Rosa motion for relief from stay.	1.50
02/07/2023	A. Gerard	B160/	Revise and finalize employment applications for Reynal and Martin.	0.80
02/07/2023	E. Weaver	B170/	Email correspondence with co-counsel's office regarding fee statements.	0.20
02/08/2023	V. Driver	B110/	Research and analyze documents on assets and companies for inclusion in statements and schedules.	1.90

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Post - petition

02/08/2023	V. Driver	B140/	Discuss concept for settling stay issues with client (.5); emails with co-counsel and Mediator on settlement proposal on stay (.3); emails with counsel for movant on converting hearing to status conference (.2).	1.00
02/08/2023	V. Driver	B150/	Weekly update call with committee (.8); emails with UST on resetting 341 (.2).	1.00
02/08/2023	V. Driver	B190/	Review and revise PO and send to counsel (.6); interview counsel for unrepresented transferee to assist in producing documents to committee (.4); meeting with client on AJ Live issues (.5); emails SubV trustee on same (.2).	1.70
02/08/2023	V. Driver	B230/	Emails with FSS on financials and review information sent on access to financials.	0.90
02/08/2023	A. Gerard	B110/	Email correspondence with counsel for committee of unsecured creditors for future omnibus setting.	0.50
02/08/2023	C. Stephenson	B150/	Review UST correspondence regarding 341 Meeting.	0.30
02/08/2023	C. Stephenson	B190/	Conference regarding revisions to protective order (.8); review related correspondence (.6).	1.30
02/08/2023	E. Weaver	B110/	Review case docket for FSS and new filings for possible response deadlines that affect AJ.	0.50

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Vickie L. Driver

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02/09/2023	V. Driver	B160/	Emails with FSS on Kennerly and employment to do taxes.	0.40
02/09/2023	V. Driver	B190/	Review and approve final PO.	0.10
02/09/2023	C. Stephenson	B160/	Review and respond to correspondence regarding professional employment issue.	0.60
02/09/2023	C. Stephenson	B190/	Review revised protective order and related correspondence.	0.50
02/10/2023	V. Driver	B110/	Analyze agenda and witness and exhibit needs for upcoming omnibus hearing (.3); review and analyze witness and exhibit lists filed by other parties (.3).	0.60
02/10/2023	V. Driver	B160/	Correspondence with J&O on fee statement objection deadline and response time.	0.20
02/10/2023	V. Driver	B210/	Review draft CC order and budget (.2); review and confirm no intention by FSS to do pre-petition accounting (.1).	0.30
02/12/2023	V. Driver	B110/	Initial review of draft schedules and statements and identify missing information (1.9); research missing information like W-2s, K1s, trust and company information (4.6).	6.50

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02/13/2023	V. Driver	B110/	<p>Call with committee re AJ Live issues (.8); arrange for associate to review all shows posted to AJ Live and his daily show and log relevant information for reference (.7); send text messages to team for review and marking under PO (.3); research into 2022 Litigation Settlement Trust assets and status (1.1); review issues with Youngevity account and its ownership and status (1.4); seeking balances in IOLTA account for amounts owed (.2); drafting global and specific notes for schedules and statements (1.6); analyze exemptions (1.1); discuss exemptions with client (.8); seek trust agreements (.5); emails with committee on information gathered by Nardello on assets (.2); review and revise draft schedules and SOFAs (2.8). 2022 Litigation Settlement Trust assets and status (1.1); review issues with Youngevity account and its ownership and status (1.4); seeking balances in IOLTA account for amounts owed (.2); drafting global and specific notes for schedules and statements (1.6); analyzing exemptions (1.1); discuss exemptions with client (.8); seeking trust agreements (.5); emails with committee on information gathered by Nardello on assets (.2); review and revise draft schedules and SOFAs (2.8).</p>	11.50
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Responsible Attorney

Vickie L. Driver

Post - petition

02/13/2023	V. Driver	B140/	Review and analyze objection to motion to assume or reject commercial lease for FSS.	0.60
02/13/2023	V. Driver	B190/	Call with Mediator on matter (.4); analyze discussion with Mediator (1.1).	1.50
02/13/2023	V. Driver	B195/	Travel to Austin (billed at half time) 3.2	1.60
02/13/2023	A. Finch	B185/	Conference regarding creditor's objection to the assumption of the studio lease.	0.20
02/13/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. World Premiere! Alex Jones Officially Launches New Podcast (2.0); summarize statements made related to case (.6).	2.60
02/13/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Alex Jones Launches His New Subscriber Platform (.4); summarize statements made related to case (.3).	0.70
02/13/2023	A. Finch	B210/	Review and analyze client's existing platform, InfoWars: Ep. 2023 Feb -13 Monday (4.0); summarize statements made related to case (.1).	4.10
02/13/2023	C. Stephenson	B110/	Review and respond to creditor request (.4); draft and revise Global Notes for schedules and SOFA (1.6); review UST correspondence (.2).	2.20

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Vickie L. Driver

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02/13/2023	C. Stephenson	B160/	Review and respond to correspondence regarding First Interim compensation procedures.	1.10
02/13/2023	C. Stephenson	B190/	Review UCC correspondence and related correspondence.	1.30
02/13/2023	E. Weaver	B110/	Review information received from BlackBriar and communications with Harold Kessler regarding same (2.0); draft and revise schedules A/B, C, G, H (4.0); draft and revise and statements (4.0).	10.00
02/13/2023	E. Weaver	B195/	Travel to Austin (billed at half time) 3.2 hrs.	1.60
02/14/2023	V. Driver	B110/	Research multiple issues to complete schedules(.9); meetings with client reviewing and revising schedules (3.4); meetings with financial professionals reviewing and revising schedules and statements (3.7); review and revise statements and schedules (2.2); research unsecured claim amounts from judgments (.9); review and revise global notes (2.3); add specific notes to explain additional information being gathered and provided (.3).	13.70
02/14/2023	V. Driver	B110/	Emails with client and Harvey D. Ellis sending trust and other documents.	0.30

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02/14/2023	V. Driver	B110/	Research Travis County for real property ownership (0.7); call with R. Battaglia on status of W-2s (.4); call with ADP lawyer seeking W-2s (.2).	1.30
			ng verdicts for amounts for unsecured claimants (1.2); review and revise global and specific notes to schedules and SOFA (2.7); research on TXSOS for company information (2.2); researching Travis county for real property ownership (1.7); call with R. Battaglia on status of W-2s (.4); call with ADP lawyer seeking W-2s (.2).	
02/14/2023	V. Driver	B140/	Prepare for and attend hearing on stay issues.	0.80
02/14/2023	V. Driver	B190/	Emails with counsel for PQPR on producing documents to SubV Trustee and privilege preservation.	0.30
02/14/2023	V. Driver	B210/	Prepare for and attend hearing on extending lease assumption date.	0.50

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

02/14/2023	A. Finch	B210/	Create a private Teams group with embedded links to each of the client's shows, as well a master Excel sheet to log the episodes reviewed, including individual links to each episode, (rough) transcriptions with linked audio of those episodes, and notes/summaries of the episodes.	0.60
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Get Off Your Ass And Help Save This Country (2.1); summarize statements made related to case (.2).	2.30
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Fires Place in Humanity (.1); summarize statements made related to case (.1).	0.20
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Alex Jones Shoots Up YouTube Golden Button Award (.1); summarize statements made related to case (.1).	0.20
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Elon's Secret Moon Base Discovered (.1); summarize statements made related to case (.1).	0.20

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Responsible Attorney
Vickie L. Driver

Post - petition

02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. The Ultimate Secret to Prosperity (.2); summarize statements made related to case (.1).	0.30
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. The most amazing Alex Jones speech you will ever see (.2); summarize statements made related to case (.1).	0.30
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. The Globalist Mindset is Total Dominion (.1); summarize statements made related to case (.1).	0.20
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Alex Jones Confronts Seattle Goblin Creatures (.2); summarize statements made related to case (.1).	0.30
02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. VICE and Ice: Alex Jones and The Fake News Mindset (.3); summarize statements made related to case (.1).	0.40

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

02/14/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Alex Jones Live and Commercial Free (.3); summarize statements made related to case (.3).	0.60
02/14/2023	A. Finch	B210/	Review and analyze client's existing platform, InfoWars: Ep. 2023 Feb -12 Sunday(2.0); summarize statements made related to case (.1).	2.10
02/14/2023	C. Stephenson	B110/	Review and revise Global Notes (1.1); draft related correspondence (.7).	1.80
02/14/2023	E. Weaver	B110/	Continue working on completing schedules A-G (2.8); review numbers from BlackBriar and draft schedules I and J (1.2); continue working on completing statements (4.0); meeting with client for review and approval of schedules and statements for filing.(1.4); final review of schedules and statements, revise, finalize and file same (3.2).	12.60
02/15/2023	J. Booth	B190/	Review and analyze the stipulated confidentiality agreement and protective order and summary regarding the same (.5); begin reviewing text messages to mark confidential or representative eyes only (.4).	0.90
02/15/2023	V. Driver	B110/	Meetings with client and McGill on operational issues and contracts with ESG.	2.60

Jones, Alex "AJ"

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Vickie L. Driver

Post - petition

02/15/2023	V. Driver	B140/	Review and analyze exhibits filed and timeline of filing cell phone texts messages by Bankston evaluating stay violation.	1.10
02/15/2023	V. Driver	B160/	Review email from Norm on post-petition payments.	0.20
02/15/2023	V. Driver	B190/	Emails team to set up production protocol call.	0.20
02/15/2023	V. Driver	B190/	Begin review of texts for marking under PO and production to Committee (.4); setting call with team to discuss review and production coordination and schedule for Committee (.2); follow up with Security bank on status of producing bank statements (.2).	0.80
02/15/2023	V. Driver	B190/	Emails with co-counsel about text filing in state court.	0.30
02/15/2023	V. Driver	B195/	Travel from Austin – billed at half time (3.6).	1.80
02/15/2023	V. Driver	B230/	Review Motion to dedesignate FSS and SUBV case and send to Trustee' counsel for input (.8); initial review of draft plan (.2).	1.00
02/15/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -15 Wednesday (4.0); summarize statements made related to case (.1).	4.10

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Vickie L. Driver

Post - petition

02/15/2023	A. Finch	B210/	Review and analyze client's new podcast/website content, Alex Jones Live: Ep. Top Forecaster Predicts Massive Tank Battles To Start in Springe (1.4); summarize statements made related to case (.2).	1.60
02/15/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -14 Tuesday (4.0); summarize statements made related to case (.1).	4.10
02/15/2023	A. Gerard	B150/	Draft response letter to official committee of unsecured creditors regarding Rule 2004 discovery.	1.60
02/15/2023	E. Weaver	B110/	Download and circulate file-stamped copies of schedules and statements to team.	0.20
02/15/2023	E. Weaver	B110/	Review case docket (.2); review continued meeting of creditors and docket same (.1).	0.30
02/15/2023	E. Weaver	B110/	Review dallaseservice inbox and circulate to team motion for new trial and motion to modify judgment pending in Travis County District Court.	0.20
02/15/2023	E. Weaver	B195/	Travel from Austin (billed at half time) 3.6 hrs.	1.80
02/16/2023	J. Booth	B190/	Conference to strategize document review and redactions.	0.50

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Vickie L. Driver

Post - petition

02/16/2023	J. Booth	B190/	Continue reviewing text messages and marking for confidentiality and professionals' eyes only.	0.40
02/16/2023	V. Driver	B110/	Review letter from UCC on schedules and SOFA and send to team for response.	0.60
02/16/2023	V. Driver	B190/	Call with Mediator (1.0); call with team on document review and production protocol (.9); emails with UCC on document production (.3).	2.20
02/16/2023	V. Driver	B230/	Call with R Battaglia on FSS operations.	0.80
02/16/2023	A. Finch	B130/	Conference regarding redaction guidelines with financial advisors.	0.50
02/16/2023	R. Mangham	B190/	Compile 241 text messages into document review platform for attorney review.	0.40
02/16/2023	E. Weaver	B110/	Review and compile bank statements and forward to UCC via fileshare.	1.00
02/16/2023	E. Weaver	B110/	Oversee RingCentral messages and forward message from the New York Times to counsel for review.	0.20
02/16/2023	E. Weaver	B110/	Various communications with Litigation Support to coordinate access to Litshare folder.	0.30
02/16/2023	E. Weaver	B190/	Team call regarding document production and protocol.	0.90

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Post - petition

02/17/2023	J. Booth	B190/	Review various correspondence with the team regarding phone call to discuss document review project.	0.10
02/17/2023	J. Booth	B190/	Continue reviewing and analyzing text messages to mark for confidentiality and attorney's eyes only.	0.90
02/17/2023	E. Weaver	B190/	Communications with A. Finch and Litigation Support regarding Everlaw files.	0.30
02/18/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -16 Thursday (4.0); summarize statements made related to case (.2).	4.20
02/18/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -17 Friday (4.0); summarize statements made related to case (.3).	4.30
02/19/2023	J. Booth	B190/	Review over 100 text messages and mark as confidential or attorney's eyes only.	1.40
02/20/2023	J. Booth	B190/	Conference regarding discovery matters.	0.20
02/20/2023	J. Booth	B190/	Review thirty (30) documents containing various text messages and mark for confidentiality.	0.70
02/20/2023	L. Dauphin	B190/	Communication regarding document review and files shared by BlackBriar Advisors.	0.50

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02/20/2023	V. Driver	B190/	Review and analyze document and information requests.	0.10
02/20/2023	V. Driver	B190/	Review information sought by UCC on Alex Jones live issues and comment to same.	0.30
02/20/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -19 Sunday (2.0); summarize statements made related to case (.1).	2.10
02/20/2023	A. Gerard	B190/	Review and summarize discovery requests from the official committee of unsecured creditors for upcoming document review.	0.70
02/20/2023	E. Weaver	B110/	Review dallaseservice inbox and circulate notice of filing supplemental exhibits in support of response to motion for sanctions pending in Travis County District Court.	0.20
02/20/2023	E. Weaver	B160/	Review order establishing procedures for interim compensation and reimbursement of expenses and docket dates and deadlines for monthly fee statements and interim fee application.	0.60
02/21/2023	J. Booth	B190/	Review list of addresses to be redacted from all documents.	0.20
02/21/2023	J. Booth	B190/	Continue reviewing various text messages and marking for confidentiality and making necessary redactions.	0.90

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Responsible Attorney

Vickie L. Driver

Post - petition

02/21/2023	J. Booth	B190/	Begin drafting a summary of trust and company agreements.	1.10
02/21/2023	L. Dauphin	B190/	Access BlackBriar dropbox and obtain bank statements and tax returns for attorney production review and redaction of personal information.	1.50
02/21/2023	V. Driver	B110/	Emails to E. Morgan seeking time to talk on her work setting up companies and trusts for debtor (.1); emails setting time to talk with D. Minton and R. Wilhite on same issues (.2); meetings with client seeking additional information for schedules (4.2). statements (2.3); call with S. Steiner on terms of helicopter access (.2); reviewing trust agreements and prepare for summary (.6); review company documents for various companies (1.1);	8.70
02/21/2023	V. Driver	B120/	Emails with Minton on trusts.	0.50
02/21/2023	V. Driver	B140/	Emails with counsel for movant on discovery and setting time to discuss potential resolution.	0.40
02/21/2023	V. Driver	B160/	Emails with N. Pattis on retainer status and accounting and potential retention terms.	0.30
02/21/2023	V. Driver	B160/	Emails seeking terms for employment from N. Pattis.	0.20

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Post - petition

02/21/2023	V. Driver	B185/	Review contracts and prepare team for motion to reject contracts.	0.20
02/21/2023	V. Driver	B195/	Travel to Austin (3.2 – billed at half time).	1.60
02/21/2023	V. Driver	B240/	Discuss results of taxation and ownership of funds in donation accounts and Bitcoin donations.	1.30
02/21/2023	V. Driver	B320/	Call with Mediator and FSS professionals.	0.70
02/21/2023	A. Finch	B190/	Draft supplemental answers to discovery requests (re: AJ Live) based on my review of client's published videos (Infowars and AJ Live).	0.70
02/21/2023	A. Finch	B190/	Redact Bank of America Statements to respond to creditors' discovery requests (.5); review Protective Order to respond to creditors' discovery requests (.1); confirm addresses/information to be redacted to respond to creditors' discovery requests (.2).	0.80
02/21/2023	E. Weaver	B190/	Email correspondence with BlackBriar Advisors regarding document production.	0.20
02/22/2023	J. Booth	B190/	Read trust agreements in detail and create a chart summarizing pertinent information.	2.90

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02/22/2023	J. Booth	B190/	Complete initial review of all Alex Jones' text messages and make redactions and mark as confidential.	1.90
02/22/2023	V. Driver	B110/	Review and analyze all information for notes and amendments to schedules and statements of financial affairs (2.1); call with D. Minton and R. Wilhite on assets (.8); emails with E. Morgan seeking to talk about trusts and companies (.2).	3.10
02/22/2023	V. Driver	B110/	Review trust summary (.4); drafting and revising proposed amendments to schedules and send to group prior to 341 meeting (4.3); weekly call with UCC and discuss motion to compel and timing for amended schedules and SOFA (.9); email to counsel for PQP.R and Jones on UCC intent to depose (.2); emails with E. Morgan on seeking information on her work for AJ on companies and trusts (.4); analyze PQPR ownership and draft chart on same (.7); call with D. Minton and R. Wilhite on trusts, divorce, and potential assets (.9).	7.80
02/22/2023	V. Driver	B140/	Emails with counsel for Texas litigants on matters proceeding in Fontaine (.3); call to discuss potential resolution to stay motion (.3).	0.60

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Post - petition

02/22/2023	V. Driver	B140/	Review information filed in TX lawsuit on sanctions hearing and emails with TX plaintiff lawyers on same.	1.20
02/22/2023	V. Driver	B150/	Emails with J. Ruff on having schedules and statements with witness at 341.	0.10
02/22/2023	V. Driver	B185/	Call with ESG on need for affidavit on equipment owned for studio (.3); emails with ESG regarding studio details (.6).	0.90
02/22/2023	A. Finch	B190/	Redact (approximately 145) Bank of America Statements to respond to creditors' discovery requests (1.8); review Protective Order to respond to creditors' discovery requests (.1); confirm redaction assignments/breakdown with team to respond to creditors' discovery requests (.1).	2.00
02/22/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -20 Monday (4.0); summarize statements made related to case (.3).	4.30
02/22/2023	A. Gerard	B160/	Draft motion to employ Pattis & Smith with declaration and proposed order.	2.50
02/22/2023	C. Stephenson	B150/	Draft correspondence regarding Creditors meeting analysis.	0.60

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02/22/2023	C. Stephenson	B210/	Review and analyze Motion to revoke Debtor's Sub V Status and draft related correspondence.	1.60
02/22/2023	E. Weaver	B110/	Electronic case file management of new trust documents received.	2.00
02/22/2023	E. Weaver	B110/	Email correspondence with BlackBriar regarding the amended December MOR and January MOR (.2); review spreadsheet regarding same (.3); draft amended December and January monthly operating reports (1.0); communications with BlackBriar Advisors regarding numbers. (.5); revise, finalize and file reports (1.2).	3.20
02/23/2023	J. Booth	B120/	Review and analyze the notice of the official committee of unsecured creditors' bankruptcy's requests for document production.	0.50
02/23/2023	J. Booth	B190/	Complete review of Alex Jones' text messages and mark for confidentiality and make necessary redactions.	2.80
02/23/2023	N. Collins	B240/	Communications with Robert Schleizer and Emily Kembell re 2021 Bitcoin donations.	1.20
02/23/2023	N. Collins	B240/	Research tax reporting compliance, gain/loss calculations and tax treatment re gifts and donations of property and cash.	2.20

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02/23/2023	C. Craig	B110/	Draft Motion to Seal Debtor's schedules.	0.70
02/23/2023	V. Driver	B150/	Review NDA with appraiser and comment to same (.3); email answers to specific questions from goods appraiser (.3); call with UST post-341 meeting to discuss schedules and statements (1.1); emails with UST on media presence at 341 (.3).	2.00
02/23/2023	A. Finch	B190/	Reaching out to three appraisal companies (and three Austin contacts to discover connections to appraisers) (.5); communicate (via email, two phone calls, and a voicemail) to confirm services offered, availability of NDA, etc. (.4).	0.90
02/23/2023	A. Finch	B190/	Conference regarding redaction guidelines with financial advisors.	2.90
02/23/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -21 Tuesday (4.0); summarize statements made related to case (.1).	4.10
02/23/2023	A. Finch	B210/	Revise notes for InfoWars: Ep. 2023 Feb -21 Tuesday.	0.20
02/23/2023	A. Gerard	B185/	Draft motion seeking order approving rejection of ESG contracts.	2.00

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Vickie L. Driver

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02/23/2023	C. Stephenson	B150/	Attend 341 Creditors meeting and draft and review related correspondence.	2.20
02/23/2023	E. Weaver	B110/	Download file-stamped copies of amended December MOR and January MOR and circulate to team.	0.20
02/23/2023	E. Weaver	B110/	Review and compile all bank statements received from BlackBriar Advisors prior to December 2022.	1.00
02/23/2023	E. Weaver	B110/	Review FSS case docket and docket related dates and deadlines.	0.30
02/24/2023	J. Booth	B190/	Review and redact 300 pages of text messages between Alex Jones and Erika Wulff; finalize document review of all sms files.	1.80
02/24/2023	V. Driver	B110/	Review NDA with appraiser and comment to same (.3); email answers to specific questions from goods appraiser (.3); call with UST post-341 meeting to discuss schedules and statements (1.1); emails with UST on media presence at 341 (.3).	2.00
02/24/2023	V. Driver	B160/	Review and revise W&E list for hearings (.4); emails with UST on status of any comments to employment apps (.2).	0.60
02/24/2023	V. Driver	B185/	Call with ESG on terms of agreement and affidavit needed.	0.70

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Vickie L. Driver

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02/24/2023	V. Driver	B190/	Emails with team on status of text message production (.2); emails with UCC on production of documents by plaintiffs (.2).	0.40
02/24/2023	A. Finch	B210/	Review and analyze client's video, Twitter (Erika Wulfe): 2023 Feb - 24 Friday (.1).	0.10
02/24/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -22 Wednesday (4.0); summarize statements made related to case (.1).	4.10
02/24/2023	E. Weaver	B160/	Draft, file and coordinate service of W&E List for 02-28-23 hearing (1.2); label and file exhibits to list (.4).	1.60
02/25/2023	A. Finch	B190/	Redact (approximately 12) Chase Bank Statements to respond to creditors discovery.	1.10
02/25/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -23 Thursday (4.0); summarize statements made related to case (.1).	4.10
02/25/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -24 Friday (4.0); summarize statements made related to case (.3).	4.30

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Responsible Attorney

Vickie L. Driver

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02/26/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -26 Sunday (2.0); summarize statements made related to case (.3).	2.30
02/27/2023	J. Booth	B190/	Conference regarding objections to document requests.	0.20
02/27/2023	V. Driver	B160/	Emails with UCC counsel on terms of Nardello app and comments to order (.4); emails with martin and Reynal in preparation for fee app hearing (.4); emails R. Battaglia on Jones matters set for hearing (.2).	1.00
02/27/2023	V. Driver	B190/	Emails on scheduling hearing on motion to compel.	0.20
02/27/2023	V. Driver	B190/	Review 2nd 2004 draft and send to team for comment (.8); emails with FSS on need for FSS assistance on analyzing transfers (.4).	1.20
02/27/2023	V. Driver	B195/	Travel from Austin to Dallas (3.6) (billed at half time).	1.80
02/27/2023	A. Finch	B190/	Redact (approximately 28) Security Bank Statements.	0.90
02/27/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -27 Monday (4.0); summarize statements made related to case (.1).	4.10
02/27/2023	C. Stephenson	B120/	Draft and review correspondence regarding trust analysis.	0.60

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02/27/2023	C. Stephenson	B160/	Review and respond to professional inquiry regarding hearing on employment applications.	0.30
02/27/2023	E. Weaver	B110/	Review dallaseservice inbox and circulate motion for sanctions against Chris Martin and Andino Reynal for groundless pleading pending in Travis County District Court.	0.20
02/27/2023	E. Weaver	B160/	Hearing prep, prepare electronic hearing notebook and exhibit binder for hearing on 02/28/23.	1.50
02/28/2023	T. Black	B190/	Revise document production per attorney instruction.	0.60
02/28/2023	J. Booth	B120/	Make revisions to the trust agreement chart.	0.30
02/28/2023	J. Booth	B190/	Strategy meeting regarding objections to the 2004 examination.	1.30
02/28/2023	J. Booth	B190/	Finalize production review (.3); coordinate production from Everlaw (.3); exchange emails with UCC regarding the text message production (.3).	0.90
02/28/2023	J. Booth	B190/	Review the order approving application of debtor for an order authorizing employment of the Reynal Law Firm, P.C. as special counsel.	0.20
02/28/2023	V. Driver	B120/	Call with trust attorney explaining trust issues and analysis needed on self-settled nature.	0.80

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Vickie L. Driver

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02/28/2023	V. Driver	B160/	Preparation for and attend hearing on applications to employ.	1.10
02/28/2023	V. Driver	B190/	Call with team on 2004 informal requests from UCC and review needed in advance of meet and confer.	0.70
02/28/2023	A. Finch	B120/	Email personal property assessor to discuss scheduling the assessments/walk thrus.	0.10
02/28/2023	A. Finch	B120/	Review email from personal property assessor with remaining questions needed to schedule the assessments/walk thrus.	0.20
02/28/2023	A. Finch	B160/	Attend hearing on employment of Martin & Reynal law firms for appeals.	0.50
02/28/2023	A. Finch	B190/	Conference regarding drafts of discovery requests and assessment of personal property (to include Austin trip).	1.00
02/28/2023	A. Finch	B190/	Review draft discovery requests from UCC (.5); note objections to same (.4).	0.90
02/28/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 Feb -28 Tuesday (4.0); summarize statements made related to case (.1).	4.10
02/28/2023	R. Mangham	B190/	Prepare documents for production by Bates labeling and marking some documents confidential (241 documents, 2005 pages).	0.40

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Vickie L. Driver

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02/28/2023	C. Ottaway	B190/	Initial contact and team call discussing Trust issues.	0.60
02/28/2023	C. Stephenson	B110/	Review UCC correspondence regarding amended schedules and related motion to compel.	0.40
02/28/2023	C. Stephenson	B160/	Review and revise January billing statement and draft related correspondence.	2.80
02/28/2023	E. Weaver	B110/	Organize downloaded filings for AJ and FSS in Litshare folder.	1.50
02/28/2023	E. Weaver	B140/	Review courtroom minutes and docket continued hearing on Pozner and De La Rosa's motion for relief from stay.	0.20
02/28/2023	E. Weaver	B160/	Draft second monthly fee statement of Crowe & Dunlevy, along with exhibits A and B.	1.80
02/28/2023	E. Weaver	B160/	Download and circulate order approving employment of Martin, Disiere, Jefferson & Wisdom and the Reynal law firm.	0.20
02/28/2023	C. Wilson	B120/	Team call discussing trust issues (0.6); initial review of trust documents (0.9); read emails regarding trust issues (0.1).	1.60

Total Hours	316.00
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Total Fees for this Invoice

\$167,552.50

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Vickie L. Driver

Post - petition

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	116.00	74,339.50	Bankruptcy - Case Administration
B120	4.60	2,174.00	Bankruptcy - Asset Analysis and Recovery
B130	0.50	152.50	Bankruptcy - Asset Disposition
B140	10.10	7,254.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B150	10.50	7,315.50	Bankruptcy - Meetings of and Communications with Creditors
B160	26.40	14,361.00	Bankruptcy - Fee/Employment Applications
B170	0.20	59.00	Bankruptcy - Fee/Employment Objections
B185	4.10	2,261.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	55.70	24,918.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	10.20	6,409.00	Bankruptcy - Non-Working Travel
B210	69.60	22,276.00	Bankruptcy - Business Operations
B230	2.70	2,146.50	Bankruptcy - Financing/Cash Collections
B240	4.70	3,328.50	Bankruptcy - Tax Issues
B320	0.70	556.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	316.00	\$167,552.50	

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Responsible Attorney

Vickie L. Driver

Post - petition

Online Research	\$41.90
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Subtotal of Costs	<u>\$41.90</u>
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Total Expenses and Costs for this Invoice	<u>\$41.90</u>
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SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E106	41.90	On-line research
Total	<u>\$41.90</u>	

Total For This Invoice	<u><u>\$167,594.40</u></u>
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Vickie L. Driver

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SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
C. Ottaway	0.60	525.00	315.00
L. Dauphin	2.00	185.00	370.00
T. Black	0.60	200.00	120.00
V. Driver	124.30	795.00	98,818.50
C. Stephenson	24.70	715.00	17,660.50
J. Booth	20.10	265.00	5,326.50
E. Weaver	44.80	295.00	13,216.00
A. Finch	79.90	305.00	24,369.50
C. Wilson	1.60	255.00	408.00
A. Gerard	12.10	345.00	4,174.50
R. Mangham	0.80	200.00	160.00
N. Collins	3.40	675.00	2,295.00
C. Craig	1.10	290.00	319.00
Total	316.00		\$167,552.50